

IN UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

WILLIAM C. BOND,

*

Plaintiff

*

v.

*

Case No.: MJG-01-CV-2600

*

KENNETH BLUM, SR., et al.

*

Defendants

* * * * *

MOTION FOR SANCTIONS

Defendant Adelberg, Rudow, Dorf & Hendler, LLC (“hereinafter Adelberg Rudow or Defendant”), by its attorneys, Andrew Radding and Michael R. Severino, files this Motion for Sanctions and states:

1. Adelberg Rudow renews its previously filed Motion for Sanctions and Memorandum in Support thereto and incorporates those arguments and exhibits herein.

2. In further support, Adelberg Rudow incorporates its Motion for Attorneys’ Fees, Supplemental Memorandum in Support thereto and exhibits attached thereto. The Supplemental Memorandum sets forth Adelberg Rudow’s updated attorneys’ fees (after a successful appeal), as well as the justification for and reasonableness of those fees.

WHEREFORE, Defendant Adelberg, Rudow, Dorf & Hendler, LLC, hereby moves this Court to award sanctions against the Plaintiff in an amount to be determined.

/s/

Andrew Radding (Bar No. 00195)
Michael R. Severino (Bar No. 25204)
Adelberg, Rudow, Dorf & Hendler, LLC
600 Mercantile Bank & Trust Building
2 Hopkins Plaza
Baltimore, Maryland 21201
(410) 539-5195

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* * * * *

ORDER

Upon the foregoing Motion for Sanctions and any Opposition filed and hearing had, it is
this ____ day of _____, 2003, by the United States District Court for the District of Maryland

ORDERED that Defendant's Motion for Sanctions be GRANTED; and further

ORDERED that Plaintiff and his counsel, jointly and severally, pay the amount of
\$_____ to Defendant Adelberg Rudow Dorf & Hendler, LLC.

JUDGE

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND